

# NSL Initial Application

Received: 07/13/20

P.O. No. NFEG0-200713-NSL000

Revised March 23, 2017

RECEIVED: 07/13/20	REVIEWER: LRL	TYPE: NSL	APP NO: pLEL2019560980
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ABOVE THIS TABLE FOR OCD DIVISION USE ONLY

**NEW MEXICO OIL CONSERVATION DIVISION**  
 - Geological & Engineering Bureau -  
 1220 South St. Francis Drive, Santa Fe, NM 87505

**ADMINISTRATIVE APPLICATION CHECKLIST**

THIS CHECKLIST IS MANDATORY FOR ALL ADMINISTRATIVE APPLICATIONS FOR EXCEPTIONS TO DIVISION RULES AND REGULATIONS WHICH REQUIRE PROCESSING AT THE DIVISION LEVEL IN SANTA FE

**Applicant:** Tap Rock Operating, LLC **OGRID Number:** 372043  
**Well Name:** WTG Fed Com #202H Well **API:** Pending  
**Pool:** Purple Sage; Wolfcamp **Pool Code:** 98220

**SUBMIT ACCURATE AND COMPLETE INFORMATION REQUIRED TO PROCESS THE TYPE OF APPLICATION INDICATED BELOW**

1) **TYPE OF APPLICATION:** Check those which apply for [A]

A. Location - Spacing Unit - Simultaneous Dedication

☒ NSL ☐ NSP (PROJECT AREA) ☐ NSP (PRORATION UNIT) ☐ SD

B. Check one only for [I] or [II]

[I] Commingling - Storage - Measurement

☐ DHC ☐ CTB ☐ PLC ☐ PC ☐ OLS ☐ OLM

[II] Injection - Disposal - Pressure Increase - Enhanced Oil Recovery

☐ WFX ☐ PMX ☐ SWD ☐ IPI ☐ EOR ☐ PPR

2) **NOTIFICATION REQUIRED TO:** Check those which apply.

- A. ☒ Offset operators or lease holders  
 B. ☐ Royalty, overriding royalty owners, revenue owners  
 C. ☐ Application requires published notice  
 D. ☐ Notification and/or concurrent approval by SLO  
 E. ☒ Notification and/or concurrent approval by BLM  
 F. ☐ Surface owner  
 G. ☒ For all of the above, proof of notification or publication is attached, and/or,  
 H. ☐ No notice required

**FOR OCD ONLY**

- ☐ Notice Complete  
☐ Application Content Complete

- 3) **CERTIFICATION:** I hereby certify that the information submitted with this application for administrative approval is **accurate** and **complete** to the best of my knowledge. I also understand that **no action** will be taken on this application until the required information and notifications are submitted to the Division.

**Note: Statement must be completed by an individual with managerial and/or supervisory capacity.**

Kaitlyn A. Luck

Print or Type Name

Signature

07/13/2020

Date

505-954-7286

Phone Number

kaluck@hollandhart.com

e-mail Address



**Kaitlyn A. Luck**  
Phone (505) 954-7286  
KALuck@hollandhart.com

July 13, 2020

**VIA ONLINE FILING**

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy,  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**Re: Application of Tap Rock Operating, LLC, for administrative approval of an unorthodox well location for its WTG Fed Com #202H Well in the W/2 of Section 27 and the W/2 of irregular Section 34, Township 26 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.**

Dear Ms. Sandoval:

Tap Rock Operating, LLC ("Tap Rock") (OGRID No. 372043) seeks administrative approval of an unorthodox well location for its **WTG Fed Com #202H Well** (API No. pending) to be completed within the Purple Sage; Wolfcamp Pool (98220) underlying the W/2 of Section 27 and the W/2 of irregular Section 34. The unorthodox location in this application encroaches on the state line of New Mexico and Texas.

This well will be drilled from a surface location 285 feet from the north line and 2000 feet from the west line (Unit C) of Section 27 to a bottom hole location 30 feet from the south line and 1920 feet from the west line (Lot 10) of Section 34. The first take point will be located 330 feet from the north line and 1920 feet from the west line (Unit C) of Section 27 and the last take point will be 100 feet from the south line and 1920 feet from the west line (Lot 10) of Section 34.

Pursuant to Division Order R-14262, this acreage is governed by the Special Rules for the Purple Sage; Wolfcamp (Gas) Pool which provide for wells in the Wolfcamp formation in Eddy County to be located no closer than 330 feet to the outer boundary of the spacing unit. The completed interval for the **WTG Fed Com #202H Well** will be unorthodox because it is closer than 330 feet to the southern boundary of the horizontal spacing unit. Approval of the unorthodox completed interval will allow Tap Rock to use its preferred well spacing plan for horizontal wells in this area and thereby prevent waste.

T 505.988.4421 F 505.983.6043

110 North Guadalupe, Suite 1, Santa Fe, NM 87501-1849

Mail to: P.O. Box 2208, Santa Fe, NM 87504-2208

[www.hollandhart.com](http://www.hollandhart.com)

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Nevada  
New Mexico

Utah  
Washington, D.C.  
Wyoming

**Exhibit A** is a Well Location and Acreage Dedication Plat (Form C-102), which shows that the completed interval of the proposed **WTG Fed Com #202H Well** encroaches on the tracts to the south.

**Exhibit B** is a land plat for Sections 27 and 34 that shows the proposed **WTG Fed Com #202H Well** in relation to the adjoining tracts to the south in the Sections 4 and 5, Block 57, Township 1 North (Loving County, Texas).

Ownership is diverse between the subject spacing unit and the tracts to the south. A copy of this application with all attachments has been sent by certified mail to each affected person advising them that if they have an objection it must be filed in writing with the Division within 20 days from the date the Division receives the application. **Exhibit C** is a list of the parties affected by the encroachment to the south together with the tracking information reflecting notice has been provided.

**Exhibit D** is a statement from Tap Rock's petroleum engineer confirming that Tap Rock's requested unorthodox location is necessary to optimize well spacing, thereby preventing waste.

Your attention to this matter is appreciated.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kaitlyn A. Luck', is written over a horizontal line.

Kaitlyn A. Luck

**ATTORNEY FOR TAP ROCK OPERATING, LLC**

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone: (575) 393-6161 Fax: (575) 393-0720

**District II**  
811 S. First St., Artesia, NM 88210  
Phone: (575) 748-1283 Fax: (575) 748-9720

**District III**  
1000 Rio Brazos Road, Aztec, NM 87410  
Phone: (505) 334-6178 Fax: (505) 334-6170

**District IV**  
1220 S. St. Francis Dr., Santa Fe, NM 87505  
Phone: (505) 476-3460 Fax: (505) 476-3462

State of New Mexico  
Energy, Minerals & Natural Resources  
Department  
OIL CONSERVATION DIVISION  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

**FORM C-102**

Revised August 1, 2011

**Submit one copy to appropriate**

**District Office**

## AMENDED REPORT

## WELL LOCATION AND ACREAGE DEDICATION PLAT

<sup>1</sup> API Number		<sup>2</sup> Pool Code	<sup>3</sup> Pool Name
<sup>4</sup> Property Code	<sup>5</sup> Property Name WTG FED COM		<sup>6</sup> Well Number 202H
<sup>7</sup> OGRID No.	<sup>8</sup> Operator Name TAP ROCK OPERATING, LLC.		<sup>9</sup> Elevation 2886'

<sup>10</sup>Surface Location

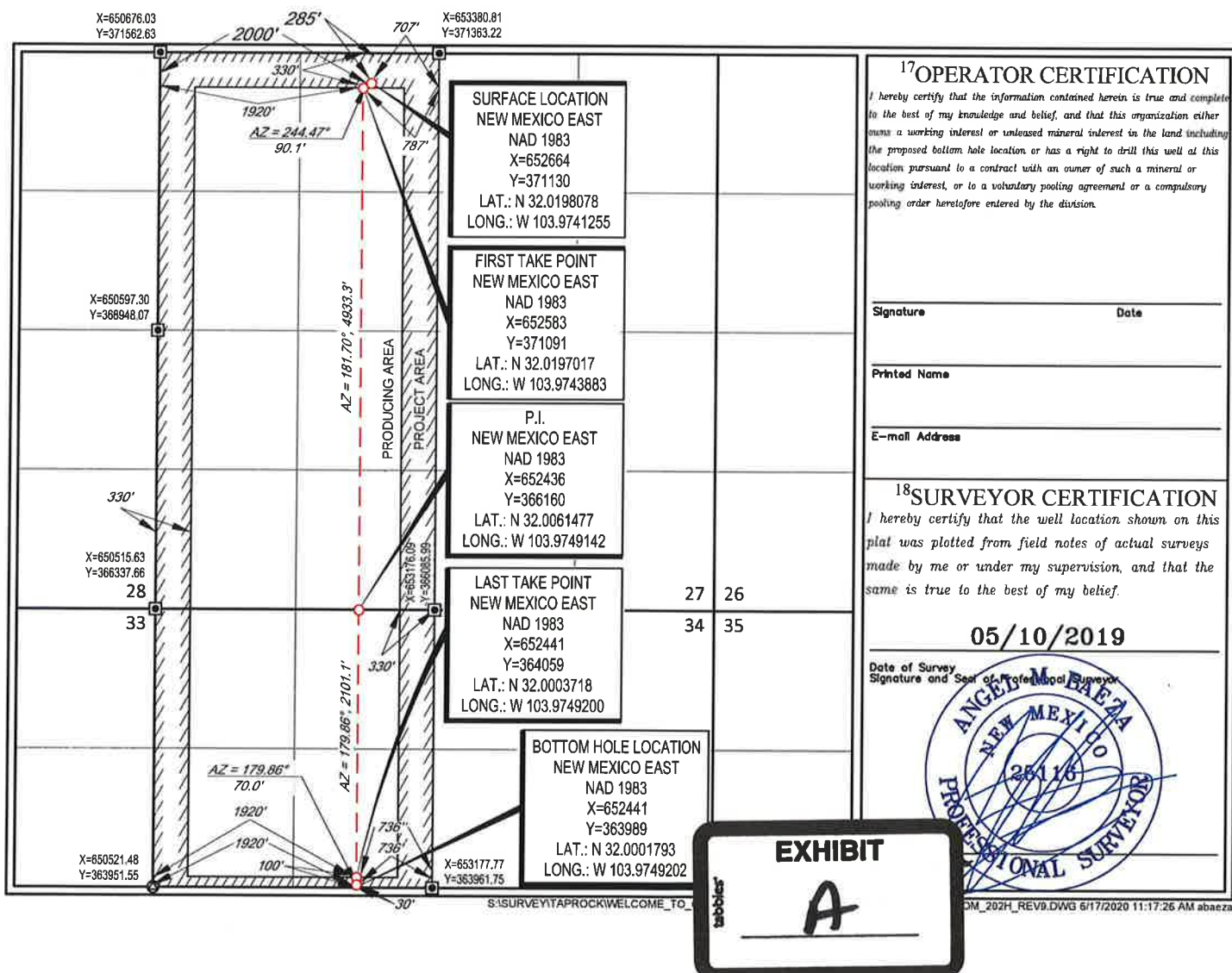
UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
C	27	26-S	29-E	-	285'	NORTH	2000'	WEST	EDDY

<sup>11</sup>Bottom Hole Location If Different From Surface

UL or lot no.	Section	Township	Range	Lot Idn	Feet from the	North/South line	Feet from the	East/West line	County
10	34	26-S	29-E	-	30'	SOUTH	1920'	WEST	EDDY

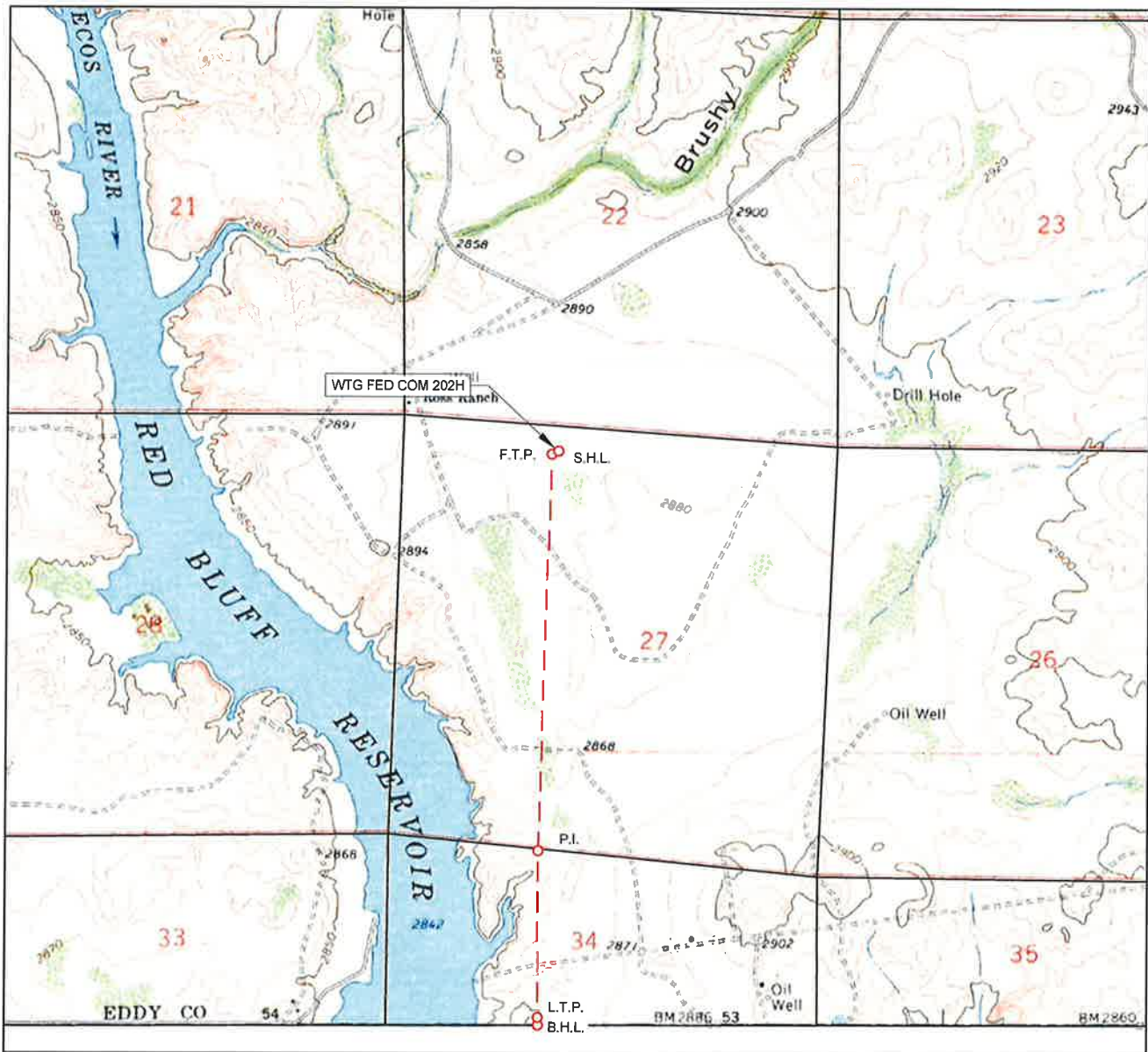
<sup>13</sup> Dedicated Acres <b>461.86</b>	<sup>13</sup> Joint or Infill	<sup>14</sup> Consolidation Code	<sup>15</sup> Order No.
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No allowable will be assigned to this completion until all interests have been consolidated or a non-standard unit has been approved by the division.





## LOCATION &amp; ELEVATION VERIFICATION MAP

LEASE NAME & WELL NO.: WTG FED COM 202H

SECTION 27 TWP 26-S RGE 29-E SURVEY N.M.P.M.  
 COUNTY EDDY STATE NM ELEVATION 2886'  
 DESCRIPTION 285' FNL & 2000' FVL

LATITUDE N 32.0198078 LONGITUDE W 103.9741255

SCALE: 1" = 2000'  
 0' 1000' 2000'

THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY TAP ROCK OPERATING, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM, EAST ZONE OF THE NORTH AMERICAN DATUM 1983, U.S. SURVEY FEET.

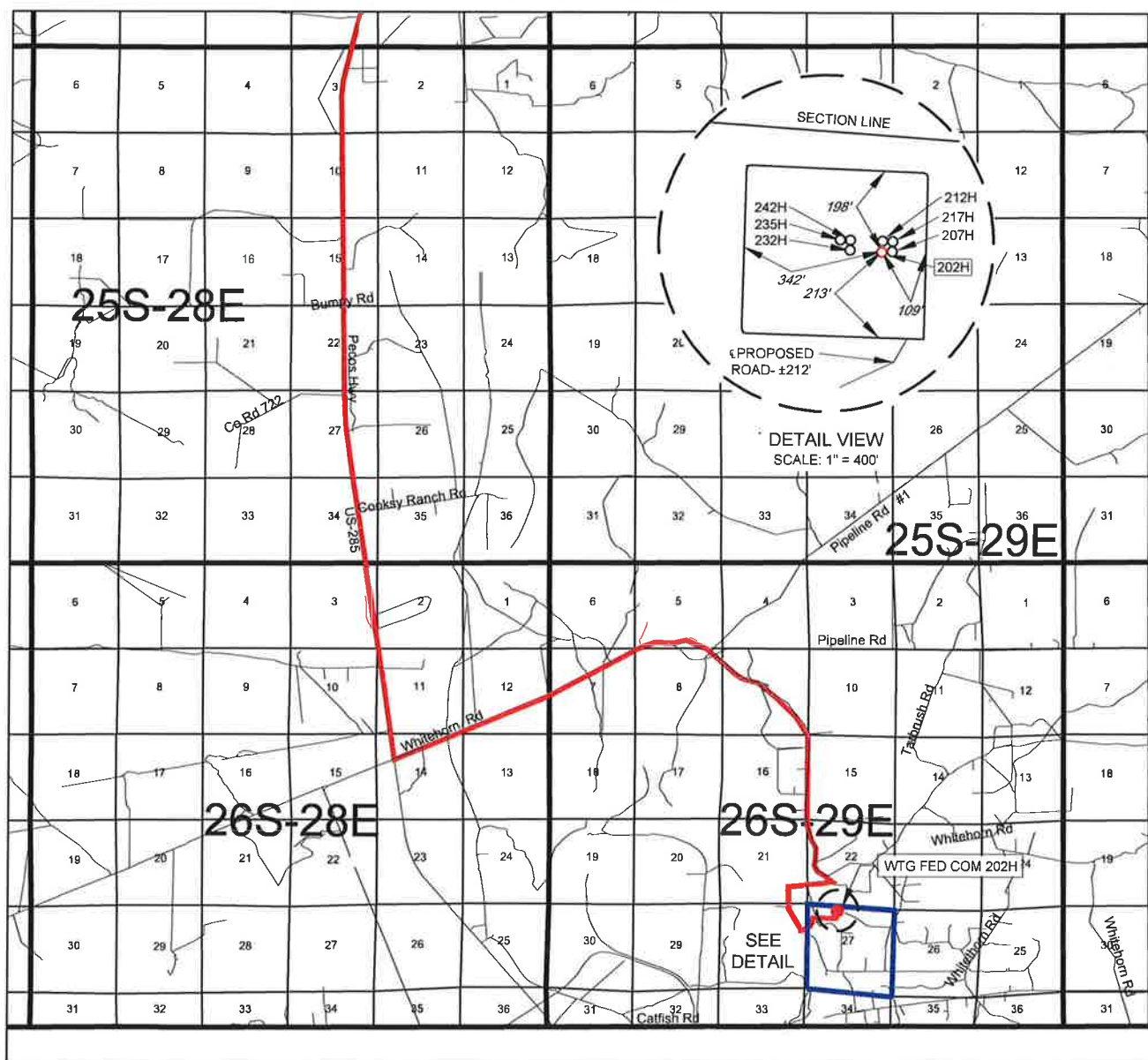


**TOPOGRAPHIC**  
 LOYALTY INNOVATION LEGACY

1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140  
 TELEPHONE: (817) 744-7512 • FAX: (817) 744-7554

2903 NORTH BIG SPRING • MIDLAND, TEXAS 79705  
 TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX: (432) 682-1743  
 WWW.TOPOGRAPHIC.COM

# EXHIBIT 2 VICINITY MAP



LEASE NAME & WELL NO.: \_\_\_\_\_ WTG FED COM 202H

SECTION 27 TWP 26-S RGE 29-E SURVEY N.M.P.M.

COUNTY EDDY STATE NM

DESCRIPTION 285' FNL & 2000' FWL

## DISTANCE & DIRECTION

FROM INT. OF US-285 & BLACK RIVER VILLAGE RD., GO SOUTH ON US-285  
±12.6 MILES, THENCE EAST (LEFT) ON WHITEHORN RD. ±2.4 MILES, THENCE  
NORTH (LEFT) ON LONGHORN RD. ±1.9 MILES, THENCE SOUTH (RIGHT) ON  
WHITEHORN RD. ±3.3 MILES, THENCE SOUTH (RIGHT) ON LEASE RD. ±1.2  
MILES, THENCE NORTHEAST (LEFT) ON A PROPOSED RD. ±0.7 MILES TO A  
POINT ±225 FEET SOUTHEAST OF THE LOCATION.

THIS EASEMENT/SERVITUDE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY  
SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA  
PROVIDED BY TAP ROCK OPERATING, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR  
ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS  
TRANSACTION ONLY.

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW  
MEXICO COORDINATE SYSTEM, EAST ZONE OF THE NORTH AMERICAN DATUM 1983, U.S. SURVEY FEET.



SCALE: 1" = 10000'  
0' 5000' 10000'



**TOPOGRAPHIC**  
LOYALTY INNOVATION LEGACY

1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140  
TELEPHONE: (817) 744-7512 • FAX (817) 744-7554

2803 NORTH BIG SPRING • MIDLAND, TEXAS 79705  
TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743  
WWW.TOPOGRAPHIC.COM







## EXHIBIT 2B



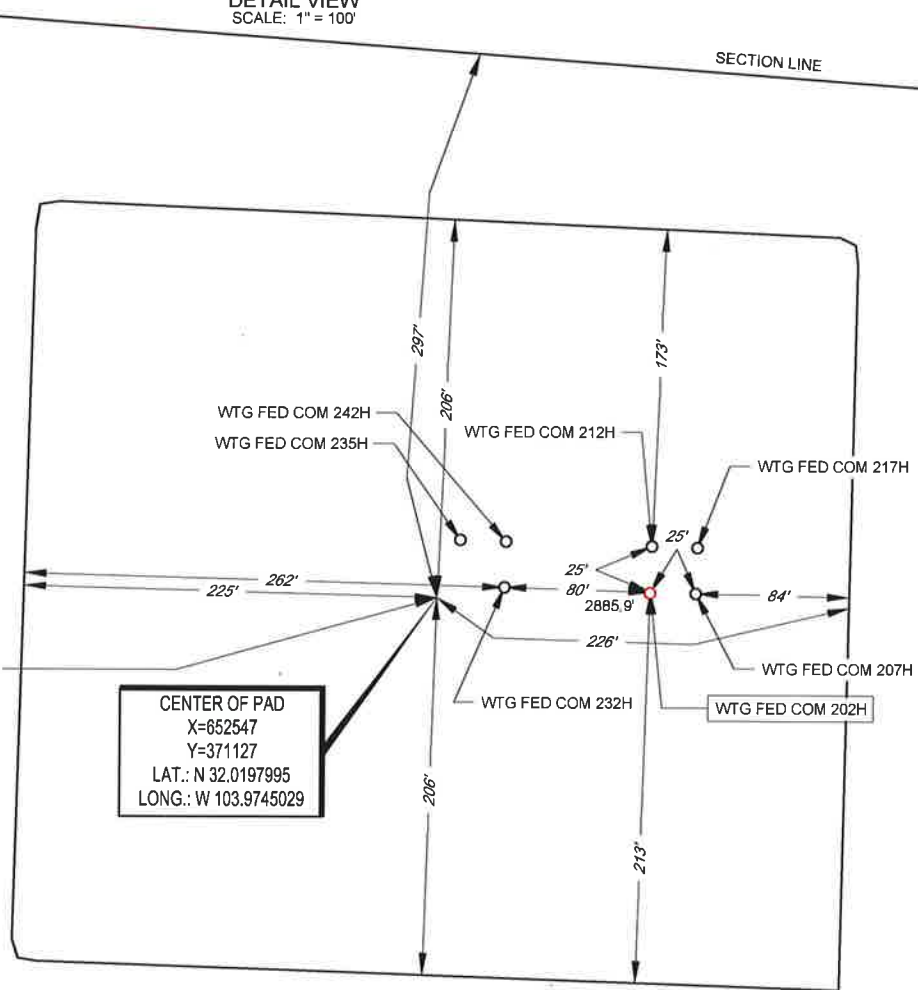
SECTION 27, TOWNSHIP 26-S, RANGE 29-E, N.M.P.M.  
EDDY COUNTY, NEW MEXICO

DETAIL VIEW  
SCALE: 1" = 100'

SCALE: 1" = 100'  
0' 50' 100'

SECTION LINE

SECTION LINE



PROPOSED  
ROAD- ±212'

LEASE NAME & WELL NO.: WTG FED COM 202H  
202H LATITUDE N 32.0198078 202H LONGITUDE W 103.9741255  
CENTER OF PAD IS 297' FNL & 1883' FWL



Angel M. Baeza, P.S. No. 25116

ALL BEARINGS, DISTANCES, AND COORDINATE VALUES CONTAINED HEREON ARE GRID BASED UPON THE NEW MEXICO COORDINATE SYSTEM OF 1983, EAST ZONE, U.S. SURVEY FEET. ELEVATIONS USED ARE NAVD88, OBTAINED THROUGH AN OPUS SOLUTION.

THIS PROPOSED PAD SITE LOCATION SHOWN HEREON HAS BEEN SURVEYED ON THE GROUND UNDER MY SUPERVISION AND PREPARED ACCORDING TO THE EVIDENCE FOUND AT THE TIME OF SURVEY, AND DATA PROVIDED BY TAP ROCK OPERATING, LLC. THIS CERTIFICATION IS MADE AND LIMITED TO THOSE PERSONS OR ENTITIES SHOWN ON THE FACE OF THIS PLAT AND IS NON-TRANSFERABLE. THIS SURVEY IS CERTIFIED FOR THIS TRANSACTION ONLY.

ORIGINAL DOCUMENT SIZE: 8.5" X 11"



1400 EVERMAN PARKWAY, Ste. 146 • FT. WORTH, TEXAS 76140  
TELEPHONE: (817) 744-7512 • FAX (817) 744-7554  
2803 NORTH BIG SPRING • MIDLAND, TEXAS 79705  
TELEPHONE: (432) 682-1653 OR (800) 767-1653 • FAX (432) 682-1743  
WWW.TOPOGRAPHIC.COM

**Legend**

WTG E2W2 Wells

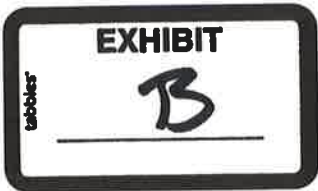
WTG W2 Unit

**Operator**

Tap Rock Resources

BHP Billiton Petroleum Properties

ConocoPhillips Company



Section 5  
Blk. 57  
T1N  
(Loving County, TX)

Section 4  
Blk. 57  
T1N  
(Loving County, TX)

**WTG Fed Com #202H, #212H, #217H NSL Notice List**

**N/2N/2 Section 5, Block 57, Township 1 North (Loving County, Texas)**

BHP Billiton Petroleum Properties  
P.O. Box 22719  
Houston, TX 77027

**N/2N/2 Section 4, Block 57, Township 1 North (Loving County, Texas)**

ConocoPhillips Company  
600 N. Dairy Ashford Rd.  
Houston, TX 77079

Bureau of Land Management  
301 Dinosaur Trail  
Santa Fe, NM 87508



HOLLAND & HART<sup>LLP</sup>



**Kaitlyn A. Luck**  
Phone (505) 954-7286  
KALuck@hollandhart.com

July 13, 2020

**VIA CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

**TO AFFECTED PARTIES:**

**Re: Application of Tap Rock Operating, LLC, for administrative approval of an unorthodox well location for its WTG Fed Com #202H Well in the W/2 of Section 27 and the W/2 of irregular Section 34, Township 26 South, Range 29 East, N.M.P.M., Eddy County, New Mexico.**

Ladies and Gentlemen:

Enclosed is a copy of the above-referenced application which was filed with the New Mexico Oil Conservation Division on this date. Any objection to this application must be filed in writing within twenty days from this date with the applicant and the New Mexico Oil Conservation Division, 1220 South St. Francis Drive, Santa Fe, New Mexico, 87505. If no objection is received within this twenty-day period, this application may be approved administratively by the Division.

If you have any questions about this application, please contact the following:

Matt Phillips  
Tap Rock Resources  
(720) 459-3724  
mphillips@taprk.com

Sincerely,

**Kaitlyn A. Luck**  
**ATTORNEY FOR TAP ROCK OPERATING, LLC**





## Shipment Confirmation Acceptance Notice

### A. Mailer Action

**Note to Mailer:** The labels and volume associated to this form online, **must** match the labeled packages being presented to the USPS® employee with this form.

**Tap Rock - 202, 212, 217 NSL  
CM# 93477.0001**

Shipment Date: 07/13/2020

Shipped From:

Name: HOLLAND & HART LLP (1)

Address: 110 N GUADALUPE ST # 1

City: SANTA FE

State: NM ZIP+4® 87501

Type of Mail	Volume
Priority Mail Express®	
Priority Mail®	0
First-Class Package Service®	
Returns	
International*	
Other	3
<b>Total</b>	<b>3</b>

\*Start time for products with service guarantees will begin when mail arrives at the local Post Office™ and items receive individual processing and acceptance scans.

### B. USPS Action

**Note to RSS Clerk:**

1. Home screen > Mailing/Shipping > More
2. Select Shipment Confirm
3. Scan or enter the barcode/label number from PS Form 5630
4. Confirm the volume count message by selecting Yes or No
5. Select Pay and End Visit to complete transaction

USPS EMPLOYEE: Please scan upon pickup or receipt of mail.  
Leave form with customer or in customer's mail receptacle.

**USPS SCAN AT ACCEPTANCE**



9275 0901 1935 6200 0022 9288 86



## Firm Mailing Book For Accountable Mail

Name and Address of Sender	Check type of mail or service	Affix Stamp Here <i>(if issued as an international certificate of mailing or for additional copies of this receipt).</i> Postmark with Date of Receipt.
Holland & Hart LLP (1) 110 N Guadalupe St # 1 Santa Fe NM 87501	<input type="checkbox"/> Adult Signature Required <input type="checkbox"/> Adult Signature Restricted Delivery <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Certified Mail Restricted Delivery <input type="checkbox"/> Collect on Delivery (COD) <input type="checkbox"/> Insured Mail <input type="checkbox"/> Priority Mail	
USPS Tracking/Article Number	Addressee (Name, Street, City, State, & ZIP Code™)	
1. 9214 8901 9403 8316 1562 26	Bureau of Land Management 301 Dinosaur Trail Santa Fe NM 87508	
2. 9214 8901 9403 8316 1562 33	BHP Billiton Petroleum Properties PO BOX 22719 Houston TX 77027	
3. 9214 8901 9403 8316 1562 40	ConocoPhillips Company 600 N Dairy Ashford Rd Houston TX 77079	
Total Number of Pieces Listed by Sender	Total Number of Pieces Received at Post Office	
3		
Postmaster, Per (Name of receiving employee)		

**TAP ROCK OPERATING**

CONNER WOOD  
ASSET MANAGER  
CWOOD@TAPRK.COM

523 PARK POINT DRIVE SUITE 200 - GOLDEN COLORADO 80401



July 8, 2020

Adrienne Sandoval, Director  
Oil Conservation Division  
New Mexico Department of Energy  
Minerals and Natural Resources  
1220 South Saint Francis Drive  
Santa Fe, New Mexico 87505

**RE: Non-Standard Location Request**  
**WTG Fed Com #202H, #212H, #217H (the "Wells")**

Dear Ms. Sandoval:

Tap Rock Operating, LLC ("Tap Rock") hereby requests administrative approval of a non-standard location for each of the Wells referenced above by decreasing the last take point from 330 feet to 100 feet from the horizontal plane outer boundary. The Wells are located in the Purple Sage – Wolfcamp Gas Pool (Pool Code 98220). It is Tap Rock's responsibility as a prudent operator to maximize lateral length and to minimize reserves left in the ground. Decreasing the last take point will increase the Wells effective lateral length by 230 feet thereby increasing ultimate recovery of reserves and thereby preventing waste of natural resources.

Sincerely,

**TAP ROCK OPERATING, LLC**

A handwritten signature in black ink, appearing to read "Conner Wood".

Conner Wood  
Asset Manager and Reservoir Engineer

